#### I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Dana Corporation-Victor Reinz Division operates a gasket manufacturing plant at Robinson in Crawford County. Production processes at this plant include mixing and milling of raw materials, forming and stamping of soft gaskets and composition parts, coating and curing of gasket materials and packaging operations.

### II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission	Source Description	Date	Emission Control
Unit		Constructed	Equipment
Unit 01	Pre-Dry Oven OV-2 &	1999	None
	Cooling Zone		
	Metal Stamping NUMS	2002	None
	1 and 2		
	Screen Cleaning SC-1	1993	None
	Parts washer PW-1	1992	None
	Roll Coaters 1 & 2	2002	None
	Priming Unit	2002	None
	Printing 1 through 7	2002	None
Unit 02	Gasket Coating & four	1967,	None
	ultraviolet and	Modified	
	electric ovens (OV-3,	1995	
	OV-4, OV-5 & OV-6)		
	Mica Coating	1992	None
Unit 03	Natural Gas-Fired Air	1996	None
	Handlers AH-1 through		
	AH-4		
Unit 04	Recovered Toluene	1973	Submerged Loading
	Storage Tank		
Unit 05	Groundwater Tank T-1,	1991	None
	Iron removal unit and		
	Air stripper AS-2		
Unit 06	Fugitive Emissions		None

# III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year	
Volatile Organic Material (VOM)	81.90	
Sulfur Dioxide (SO <sub>2</sub> )		
Particulate Matter (PM)	3.60	
Nitrogen Oxides $(NO_x)$	5.89	
HAP, not included in VOM or PM		
TOTAL	91.39	

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

### V. PROPOSED PERMIT

## CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

## Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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